

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

TREVOR MILTON,

*Defendant.*

No. 21-cr-478 (ER)

**DECLARATION OF  
CURTIS M. TUTTLE**

I, CURTIS M. TUTTLE, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the principle at Curtis M. Tuttle Law, PLLC, and counsel of record to Trevor Milton in *Hicks v. Milton*, No. 2:22-cv-00166-HCN (D. Utah) (the “Civil Case”). I submit this declaration in support of Mr. Milton’s Motion for a New Trial on Count Four.

2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts of the deposition of Peter Hicks in the Civil Case, which took place on April 22 and 23, 2024. (Peter Hicks testified in both his individual capacity and as a corporate representative for Hicks, LLC and Wasatch Hicks, LLC.)

3. Attached hereto as **Exhibit B** is a true and correct copy of Exhibit 35 from the deposition of Peter Hicks in the Civil Case.

4. Attached hereto as **Exhibit C** is a true and correct copy of Exhibit 69 from the deposition of Peter Hicks in the Civil Case.

5. Attached hereto as **Exhibit D** is a true and correct copy of Exhibit 72 from the deposition of Peter Hicks in the Civil Case.

6. Attached hereto as **Exhibit E** is a true and correct copy of Exhibit 22 from the deposition of Peter Hicks in the Civil Case.

7. Attached hereto as **Exhibit F** is a true and correct copy of Exhibit 30 from the deposition of Peter Hicks in the Civil Case.

8. Attached hereto as **Exhibit G** is a true and correct copy of Exhibit 97 from the deposition of Peter Hicks in the Civil Case.

9. Attached hereto as **Exhibit H** is a true and correct copy of Exhibit 81 from the deposition of Peter Hicks in the Civil Case.

10. Attached hereto as **Exhibit I** is a true and correct copy of Exhibit 94 from the deposition of Peter Hicks in the Civil Case.

11. Attached hereto as **Exhibit J** is a true and correct copy of an email dated February 26, 2021 from Rose Hicks to Peter Hicks, which was collected via a forensic examination of Peter Hicks's electronic devices and accounts conducted by the e-discovery firm Consilio at the direction of Milton's counsel.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Salt Lake City, Utah  
November 7, 2024



CURTIS M. TUTTLE